

1 PHILLIP A. TALBERT  
2 United States Attorney  
3 PETER K. THOMPSON  
4 Acting Regional Chief Counsel, Region IX  
5 Social Security Administration  
6 CASPAR CHAN, CSBN 294804  
7 Special Assistant United States Attorney  
8 160 Spear Street, Suite 800  
9 San Francisco, CA 94105  
10 Telephone: 510-970-4810  
11 Facsimile: 415-744-0134  
12 Email: Caspar.Chan@ssa.gov  
13 Attorneys for Defendant

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

20 CHRISTINE RUSH, ) Civil No. 1:22-cv-00417-GSA  
21 Plaintiff, )  
22 v. )  
23 KILOLO KIJAKAZI, )  
24 Acting Commissioner of Social Security, )  
25 Defendant. )  
26 \_\_\_\_\_)

27 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security  
28 (the “Commissioner”), shall have an extension of time to respond to Plaintiff’s Complaint in this case.  
In support of this request, the Commissioner respectfully states as follows:

1. Defendant’s response to Plaintiff’s Complaint is due July 12, 2022. Defendant has not  
previously requested an extension of this deadline.

2. The certified administrative record (CAR) in this case has not yet been finalized for filing.  
Counsel for the Commissioner has been in contact with the Office of Appellate Operations, which is  
responsible for preparation of CARs and is actively working on certifying the CAR. Accordingly,  
Defendant requests an extension of 45 days to respond to Plaintiff’s Complaint.

3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he has no objections.

4. This request is made in good faith and is not intended to delay the proceedings in this matter.

WHEREFORE, Defendant requests until August 26, 2022, respond to Plaintiff's opening brief.

Respectfully submitted,

Date: July 8, 2022

## LAW OFFICES OF FRANCESCO BENAVIDES

By: /s/ Caspar Chan for Francesco Benavides\*

FRANCESCO BENAVIDES

\*Authorized by email on July 8, 2022

Attorneys for Plaintiff

Date: July 8, 2022

PHILIP A. TALBERT

## United States Attorney

## Eastern District of California

By: /s/ Caspar Chan

CASPAR CHAN

## Special Assistant United States Attorney

Attorneys for Defendant

## ORDER

IT IS SO ORDERED.

Dated: **July 8, 2022**

**/s/ Gary S. Austin**

---

UNITED STATES MAGISTRATE JUDGE